

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LEONA HUNTER and ANNE MARIE VILLA,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

TIME WARNER CABLE INC.,

Defendant.

Case No. 1:15-cv-06445-JPO

**DECLARATION OF ANDREW D.
PRINS**

I, ANDREW D. PRINS, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a partner of Latham & Watkins LLP and an attorney of record for Time Warner Cable, Inc. (“TWC”) in the above-captioned matter.
2. I have personal knowledge of the matters set forth herein. If called and sworn as a witness, I could and would competently testify thereto.
3. Attached hereto as **Exhibit A** is a true and correct copy of an excerpt of Plaintiffs’ Objections and Answers to Defendant’s Fifth Set of Interrogatories in the form produced by Plaintiffs in this matter, which has been excerpted to include only those pages which are cited in TWC’s brief in opposition to class certification.
4. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiffs’ Response to TWC’s First Requests for Admission in the form produced by Plaintiffs in this matter, which has been excerpted to include only those pages which are cited in TWC’s brief in opposition to class certification.
5. Attached hereto as **Exhibit C** is a true and correct copy of the transcript of the deposition

of Matt Rateliff, dated September 10, 2018, which has been excerpted to include only those pages which are cited in TWC's brief in opposition to class certification.

6. Attached hereto as **Exhibit D** is a true and correct copy of the transcript of the deposition of Randall Snyder, dated December 18, 2018, which has been excerpted to include only those pages which are cited in TWC's brief in opposition to class certification and related *Daubert* motions.

7. Attached hereto as **Exhibit E** is a true and correct copy of the transcript of the deposition of Colin Weir, dated December 21, 2018, which has been excerpted to include only those pages which are cited in TWC's brief in opposition to class certification and related *Daubert* motions.

8. Attached hereto as **Exhibit F** is a true and correct copy of the transcript of the deposition of David Zitko, dated October 9, 2018, which has been excerpted to include only those pages which are cited in TWC's brief in opposition to class certification and related *Daubert* motions.

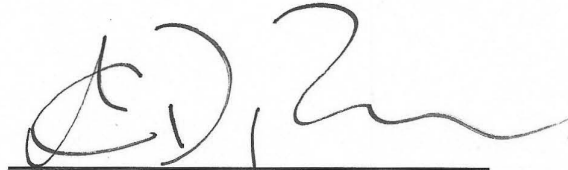
9. Attached hereto as **Exhibit G** is a true and correct copy of the transcript of the deposition of Leona Hunter, dated August 11, 2016, which has been excerpted to include only those pages which are cited in TWC's brief in opposition to class certification.

10. Attached hereto as **Exhibit H** is a true and correct copy of the "company report of [REDACTED] [REDACTED] in the form that I caused it to be downloaded from Orbis/Bureau van Dijk (<https://orbis.bvdinfo.com>) on December 19, 2018.

I declare under penalty of perjury that the foregoing is true and correct under the laws of the United States of America.

Executed this 22nd day of January 2019

at Washington, D.C.



Andrew D. Prins